

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE



Jonathan Leite,
Plaintiff

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v.

Civil No. 15-cv-00280-PB

Matthew Goulet *et al.*,
Defendants

AFFIDAVIT OF EJIKE ESOBE

I, Ejike Esobe, upon oath do hereby depose and state as follows:

1. I was employed by the New Hampshire Department of Corrections (“DOC”) as a corrections officer at the Northern New Hampshire Correctional Facility (“NCF”) in Berlin, New Hampshire during 2012 and 2013. I make this affidavit based on my personal knowledge.

2. A DOC shift log for August 24, 2012 reflects that I worked in CP5, which is short for control point 5, during second shift on August 24, 2012. *See* Exhibit B-6 to the Affidavit of Jeffrey Smith, Upper Housing Shift Log.

3. CP5 is a control room that is used to operate all doors within the upper housing and industries area.

4. When I worked for DOC, CP5 had two video monitors that the officer assigned to that post could use to view live video of the many cameras that capture, the stairwell, the industries area, and the upper inmate housing units.

5. On August 24, 2012, I had no knowledge that Mr. Leite was in any danger of being assaulted, or that there was any specific risk of harm to this inmate. At no point on or

before August 24, 2012 was I informed by Mr. Leite or any other individual of a potential threat to Mr. Leite or to any other inmate on F-block that day.

6. During second shift of August 24, 2012, I did not observe any activity on F-block that made me question the safety of the inmates residing there. Had I seen any such activity, I would have reported it to the unit officers.

7. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: October 10, 2017

s/ Ejike Esobe
Ejike Esobe